

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN**

State Farm Mutual Automobile Insurance Company,

Plaintiff,

v.

Physiomatrix, Inc.,

Genex Physical Therapy, Inc.,

Kallil I. Kazan, D.C.,

Naim Khanafer, D.C.,

Sami Abu Farha, M.D.,

Sami Abu Farha, M.D., P.C.,

Tete Oniang'o, M.D.,

Tete Oniang'o, M.D., P.L.L.C.,

Defendants,

And

Physiomatrix, Inc.,

Genex Physical Therapy, Inc.,

Counter-Plaintiffs,

v.

State Farm Mutual Automobile Insurance Company,

Counter-Defendant,

Michael Flannery,

Nicole Lefere,

Ruth Johnson, Michigan Secretary of State,

in Her Official Capacity Only, and

Kevin Clinton, Michigan Commissioner of Insurance,

in His Official Capacity Only,

Third-Party Defendants.

Case No. 12-cv-11500

Hon. John C. O'Meara

Magistrate Judge David R. Grand

**DEFENDANTS PHYSIOMATRIX, INC., GENEX PHYSICAL THERAPY, INC.,
KALLIL I. KAZAN, D.C., AND NAIM KHANAFER WITNESS LIST**

NOW COMES Defendant, PHYSIOMATRIX, INC., GENEX PHYSICAL THERAPY, INC, KALLIL I. KAZAN, D.C., and NAIM KHANAFER, D.C, (the "Clinic Defendants"), by their above referenced counsel,, and as its list of witnesses states as follows:

OBJECTION:

As of the date of this filing, Defendants have been unable to complete discovery, including but not limited to deposing Plaintiff or other witnesses identified by Plaintiff. As a consequence, as of the date of this filing, Defendants have not obtained all information related to Plaintiff's actions as the same relate to its claims in this case. Defendants may have to supplement the witness and exhibit lists as a result of learning new or additional information regarding Plaintiff and its claims. Subject to the foregoing, Defendants identify their proposed witnesses and exhibits as follows:

WITNESS LIST

1. Dr. Sami Abu Farha, M.D., c/o counsel.
2. Dr. Tete Oniang'O, M.D., c/o counsel.
3. Kalil I. Kazan, D.C., c/o counsel.
4. Naim Khanafer, D.C., c/o counsel.
5. Karishma Patel, PT, c/o counsel for the Clinic Defendants.
6. Ajay Kallem, PT, c/o counsel for the Clinic Defendants.
7. V. Sankeerth Reddy, PT. c/o counsel for the Clinic Defendants.
8. Amir Nawar, PT. c/o counsel for the Clinic Defendants.
9. Naga Maddali, PT c/o counsel for the Clinic Defendants.
10. Gayatri Joshi, PT. c/o counsel for the Clinic Defendants.
11. Abhijeet Vidya PT, c/o counsel for the Clinic Defendants

12. Vipin Muppidi, PT c/o counsel for the Clinic Defendants
13. Ali Bazzi, PT aides c/o counsel for the Clinic Defendants
14. Robyn Amr, PT aides c/o counsel for the Clinic Defendants
15. Carma Ashkar PT aides c/o counsel for the Clinic Defendants
16. Noor Abazid PT aides c/o counsel for the Clinic Defendants
17. Delida Boussi PT aides c/o counsel for the Clinic Defendants
18. Zeinab Hourani PT aides c/o counsel for the Clinic Defendants
19. Amanda Haralji PT aides c/o counsel for the Clinic Defendants
20. Rana Nahass PT aides c/o counsel for the Clinic Defendants
21. Lelia Hazimeh PT aides c/o counsel for the Clinic Defendants
22. Fatima Hazimeh PT aides c/o counsel for the Clinic Defendants
23. Hyat Srour PT aides c/o counsel for the Clinic Defendants
24. Rasul Masdi PT aides c/o counsel for the Clinic Defendants
25. Sue Abdallah PT aides c/o counsel for the Clinic Defendants
26. Hawra Hadwan PT aides c/o counsel for the Clinic Defendants
27. Samar Gomah PT aides c/o counsel for the Clinic Defendants
28. Zeinab Othman PT aides c/o counsel for the Clinic Defendants
29. Polly Swingle, c/o counsel for State Farm
30. Steve Geiringer, MD., c/o counsel for State Farm
31. Justin Ruitta, MD., c/o counsel for State Farm
32. Naiel Salameh, D.C., c/o counsel for the Clinic Defendants.
33. Suzanne Berry, President of H & S Billing, Inc., c/o counsel for the Clinic Defendants
34. H & S Billing Inc. the billing entity for the Clinic Defendants.

35. Sherkish Burnette, patient, address contained in medical records.
36. Zahra Alkhalili, patient, address contained in medical records.
37. Eugene Tucker, patient, address contained in medical records.
38. Lisa Griffin, Claims Representative, c/o counsel for State Farm.
39. Mitchell Z. Pollak, M.D., IME, c/o counsel for State Farm.
40. Denise Stahl, patient, address contained in medical records.
41. Ahmed Ahmed, patient, address contained in medical records.
42. Andre Booker, patient, address contained in medical records.
43. Ashia Lee, patient, address contained in medical records.
44. Crystal Cooper, patient, address contained in medical records
45. Damesha Jackson, patient, address contained in medical records
46. Dominique Mathis, patient, address contained in medical records.
47. Hassan Alghaithi, patient, address contained in medical records.
48. Kalid Wali, patient, address contained in medical records.
49. Lajoya Jacobs, patient, address contained in medical records.
50. Daniel Smith Claims Representative, c/o counsel for State Farm.
51. Leoard McGlown patient, address contained in medical records.
52. Jodi Peek, patient, address contained in medical records
53. Thom Connolly, Claims Representative, c/o counsel for State Farm.
54. Larhonda Gand patient, address contained in medical records.
55. Lisa Gaines, patient, address contained in medical records.
56. Alice McMillian, Claims Representative, c/o counsel for State Farm.
57. Maelia Snider, patient, address contained in medical records.

58. Maria Pruitt, patient, address contained in medical records.
59. Hana Rhodes, Claims Representative, c/o counsel for State Farm.
60. Marni Wahlan, patient, address contained in medical records.
61. Jodi Pollick, Claims Representative, c/o counsel for State Farm.
62. Mousa Alaradi, patient, address contained in medical records.
63. Nadia Alasawy, patient, address contained in medical records
64. Niran Al-Bayati, patient, address contained in medical records.
65. Phillip Herndon, patient, address contained in medical records.
66. Shanae Johnson, patient, address contained in medical records.
67. Wassim Timimi, patient, address contained in medical records.
68. Marcia Veltin, Claims Representative, c/o counsel for State Farm.
69. Yvette Joyce, patient, address contained in medical records.
70. Nia Nichols, patient, address contained in medical records.
71. Tony Wash, patient, address contained in medical records.
72. Dawn Shafer, Claims Representative, c/o counsel for State Farm.
73. MES Solutions, Independent Medical Evaluation Company, employees and records
custodian
74. Dr. Joseph P. Femminino, M.D., IME, c/o counsel for State Farm.
75. Siddiquah Wright, patient, address contained in medical records.
76. Ron Ikens, State Farm Team Manager, c/o counsel for State Farm.
77. Melissa Mitchell, Claims Representative, c/o counsel for State Farm.
78. Guy Hughes, Claims Representative, c/o counsel for State Farm.
79. Susan Hood, Claims Representative, c/o counsel for State Farm.

80. Damar Walston, patient, address contained in medical records.
81. Katrice Smith, patient, address contained in medical records.
82. Alberto Rivera, patient, address contained in medical records.
83. Alfred Owens, patient, address contained in medical records.
84. Kami Phillips, Claims Representative, c/o counsel for State Farm.
85. Ali Roomy, patient, address contained in medical records.
86. Angela Alexander, patient, address contained in medical records.
87. Nationwide Insurance/Victoria Insurance/Titan Insurance, records custodian and employees
88. Jay Melanson, Titan Adjustor, c/o counsel for State Farm.
89. Mitchell Medical, records custodian and employees
90. Howard Baum, Titan Claims Representative, c/o counsel for State Farm.
91. Angelo Bowlson, patient, address contained in medical records.
92. April Baldwin, patient, address contained in medical records.
93. Aya Mchgharani, patient, address contained in medical records.
94. Aziza Saab, patient, address contained in medical records.
95. Evaluations Plus, Inc., IME facility, employees and records custodian
96. Pamela Greene, Claims Representative, c/o counsel for State Farm.
97. Brandon Hatcher, patient, address contained in medical records.
98. Michael Blue, Claims Representative, c/o counsel for State Farm.
99. Charles Carter, patient, address contained in medical records.
100. Christian Gladden, patient, address contained in medical records.
101. Rich Bean, patient, address contained in medical records.

102. Christopher Livingston, patient, address contained in medical records.
103. Kelly Miller, Claims Representative, c/o counsel for State Farm.
104. Davonte Lane, patient, address contained in medical records.
105. Deangelo Reynolds, patient, address contained in medical records.
106. Charlotte Davis, Claims Representative, c/o counsel for State Farm.
107. Desmetrice Ward, patient, address contained in medical records.
108. Andrea Justin, Claims Representative, c/o counsel for State Farm.
109. Dinisha Phillips, patient, address contained in medical records.
110. Eugene Smith, patient, address contained in medical records.
111. Diane Walsh, Claims Representative, c/o counsel for State Farm.
112. Annette DeSantis, M.D., IME, c/o counsel for State Farm.
113. Faizie Saad, patient, address contained in medical records.
114. Fatima Al-Nassiry, patient, address contained in medical records.
115. Linda Bradley, Claims Representative, c/o counsel for State Farm.
116. Kanwaldeep Sidhu, M.D., IME, c/o counsel for State Farm.
117. Gloria Gooden, patient, address contained in medical records.
118. Exam Works, Inc., IME Facility, employees and records custodian
119. Dr. Chris Kazmierczak, M.D., IME, c/o counsel for State Farm.
120. Kelly Blevins, Claims Representative, c/o counsel for State Farm.
121. Hassan Nasser, patient, address contained in medical records.
122. Hawra Algarawi, patient, address contained in medical records.
123. Dr. Mary K. Kneiser, M.D., IME, c/o counsel for State Farm.
124. Ability Assessments P.C., IME Facility, employees and records custodian

125. James Carrecker, patient, address contained in medical records.
126. Ruthanne Mosher, Claims Representative, c/o counsel for State Farm.
127. James Harvey, patient, address contained in medical records.
128. Jameisha Irving, patient, address contained in medical records.
129. Barbara Heemer, Claims Representative, c/o counsel for State Farm.
130. Jeffrey Tyson, patient, address contained in medical records.
131. Jeremy Fisher, patient, address contained in medical records.
132. Angela Murphy, Claims Representative, c/o counsel for State Farm.
133. Johnny Gibson, patient, address contained in medical records.
134. Kelly Dumoulin, patient, address contained in medical records.
135. Dr. Eugene Mitchell, Jr., M.D., IME, c/o counsel for State Farm.
136. April Hawkins, Claims Representative, c/o counsel for State Farm.
137. Lanell Oliver, patient, address contained in medical records.
138. Nancy Maisner, Claims Representative, c/o counsel for State Farm.
139. Lawanda Harper, patient, address contained in medical records.
140. Cheryl Kucharski, Claims Representative, c/o counsel for State Farm.
141. Levi Cox, patient, address contained in medical records.
142. Daniel Smith, Claims Representative, c/o counsel for State Farm.
143. Lonnie Grigsby, patient, address contained in medical records.
144. Specialists in Rehabilitation Medicine, P.C., IME facility, employees and records
custodian
145. Dr. Steven Arbit, M.D., IME, c/o counsel for State Farm.
146. Lashawnda Weathers, patient, address contained in medical records.

147. Mahmoud Elabed, patient, address contained in medical records.
148. Malak Hamad, patient, address contained in medical records.
149. Jeffrey Edwin Middeldorf, D.O., IME, c/o counsel for State Farm.
150. Natalie Kahler, Claims Representative, c/o counsel for State Farm.
151. Martina Harris, patient, address contained in medical records.
152. Nida Selih, patient, address contained in medical records.
153. Osta Asfour, patient, address contained in medical records.
154. Patricia McCullough, patient, address contained in medical records.
155. Pierre Fullove, patient, address contained in medical records.
156. Qais Aladhimy, patient, address contained in medical records.
157. Quentin Chappy, patient, address contained in medical records.
158. Maria Albarran, Claims Representative, c/o counsel for State Farm.
159. Dr. David Spiteri, M.D., IME, c/o counsel for State Farm.
160. Quineth Simon-Hill, patient, address contained in medical records.
161. Kristina Myslinski, Claims Representative, c/o counsel for State Farm.
162. Quinicka Keaton, patient, address contained in medical records.
163. Rachel Kubus, patient, address contained in medical records.
164. Raven Dyer, patient, address contained in medical records.
165. Regina Dickinson, patient, address contained in medical records.
166. Roderick Stallworth, patient, address contained in medical records.
167. Salaheddin Ramadan, patient, address contained in medical records.
168. Cindy Sundberg, Claims Representative, c/o counsel for State Farm.
169. Steven Murphy, patient, address contained in medical records.

- 170. Profession Medical Services, IME facility, employees and records custodian
- 171. Sumaya Rashed, patient, address contained in medical records.
- 172. Dr. Steven Harwood, M.D., IME, c/o counsel for State Farm.
- 173. Tamika Lovejoy, patient, address contained in medical records.
- 174. Teela Harris, patient, address contained in medical records.
- 175. Mitchell Pollack, M.D. IME, c/o counsel for State Farm.
- 176. Tracey Haymer, patient, address contained in medical records.
- 177. Tristan Ragins, patient, address contained in medical records.
- 178. Wassim Bazzi, patient, address contained in medical records.
- 179. Gary L. Trock, M.D., IME, c/o counsel for State Farm.
- 180. Tammy McLeod, patient, address contained in medical records.
- 181. Kenisha Waldon, patient, address contained in medical records.
- 182. Marteen Stenson, patient, address contained in medical records.
- 183. Deborah Franklin, Claims Representative, c/o counsel for State Farm.
- 184. Patricia Parr, State Farm employee, c/o counsel for State Farm.
- 185. Meoshe Owensby, patient, address contained in medical records.
- 186. Wendell Perry, patient, address contained in medical records.
- 187. Rick Hamme, Claims Representative, c/o counsel for State Farm.
- 188. Joyce Todd, patient, address contained in medical records.
- 189. Michael Clemon, patient, address contained in medical records.
- 190. Linda Williams, Claims Representative, c/o counsel for State Farm.
- 191. Hussain Al-Kafili, patient, address contained in medical records.
- 192. Alonzo Moore, patient, address contained in medical records.

193. Dr. Philip Mayer, M.D., IME, c/o counsel for State Farm.
194. Annie Beard, patient, address contained in medical records.
195. Abbas Taher, patient, address contained in medical records.
196. Elizabeth Mirabatur, Claims Representative, c/o counsel for State Farm.
197. Bajalah Saleh, patient, address contained in medical records.
198. Ditar Ramoli, patient, address contained in medical records.
199. David Tomaszewski, patient, address contained in medical records.
200. Mona Ali, patient, address contained in medical records.
201. Mastoor Ali, patient, address contained in medical records.
202. Steven Sampson, patient, address contained in medical records.
203. Toriyana Winfield, patient, address contained in medical records.
204. Angelo Weems, patient, address contained in medical records.
205. Ahmad Taha Abulabon, PT, c/o counsel for State Farm.
206. Earloranda Bailey, patient, address contained in medical records.
207. Ali Athira, patient, address contained in medical records.
208. Dewayne Dawson, patient, address contained in medical records.
209. Renae Campau, Claims Representative, c/o counsel for State Farm.
210. Emma Carter, patient, address contained in medical records.
211. Crystal Williams, patient, address contained in medical records.
212. Deron Brewster, patient, address contained in medical records.
213. Judy Wood, patient, address contained in medical records.
214. Martise Washington, patient, address contained in medical records.
215. Otis Cottingham, patient, address contained in medical records.

216. Pamela Ford, patient, address contained in medical records.
217. Richard Glover, patient, address contained in medical records.
218. Robert Daniels, patient, address contained in medical records.
219. Sajad Alnassiry, patient, address contained in medical records.
220. Wissam Fadallah, patient, address contained in medical records.
221. Marcellus Gowens, patient, address contained in medical records.
222. Patients listed by Plaintiff in the charts attached as exhibits to the Complaint
223. Current and former Representatives, Agents and Employees of State Farm., with knowledge of the facts related to this matter c/o counsel.
224. Current and Former Claim Representatives of State Farm, with knowledge of the facts related to this matter c/o counsel.
225. Nicole Lefere, c/o counsel for State Farm.
226. Michael Flannery, c/o counsel for State Farm.
227. Ann Kamego, claim supervisor c/o counsel for State Farm.
228. Current and former Independent Medical Examiners and their facilities utilized by State Farm in handling the claims at issue in this action, with knowledge of the facts related to this matter c/o counsel.
229. All necessary rebuttal or impeachment witnesses;
230. All persons necessary for authentication of documents;
231. Defendants reserve the right to add to or amend this witness list at any time prior to the trial of this matter.

Respectfully submitted,

Dated: July 1, 2013

/s/Gary R. Blumberg

Gary R. Blumberg, PC

Gary R. Blumberg (P29820)

*Attorneys for Counter and Third Party Plaintiffs
Physiomatrix, Inc., Genex Physical Therapy Inc.*

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/s/Peter W. Joelson

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PROOF OF SERVICE

The undersigned certifies that on July 1, 2013, the foregoing Witness List and this Proof of Service was served upon all parties to the above cause to each of the attorneys of record herein at their respective addresses as disclosed on the pleadings via the court's ecf system.

Dated: July 1, 2013

/s/ Susan C. Brohman